

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

**INFORMATIVE TECHNOLOGY  
SYSTEMS, LLC,**

**Plaintiff,**

**v.**

**FASOO, INC.**

**Defendant.**

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**Case No. 8:22-cv-00036-PX**

**Patent Case**

**JURY TRIAL DEMANDED**

**DEFENDANT’S MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12 and L.R. 105, Defendant Fasoo, Inc. (“Fasoo”) moves this Court to dismiss the Complaint, (Dkt. #1), on the grounds that it fails to state a claim upon which relief may be granted. This Motion is based upon Defendant’s Memorandum In Support of Motion to Dismiss, filed contemporaneously herewith, and the pleadings and papers of record in this action.

WHEREFORE, Fasoo respectfully prays that this Court:

- a) Dismiss the Complaint with prejudice;
- b) Enter judgment in favor of Fasoo and against Plaintiff on all claims asserted in the Complaint;
- c) Award Fasoo its costs and fees in defending this action; and
- d) Award Fasoo such other and further relief as this Court deems just and proper, premises considered.

Dated: April 5, 2022

Of Counsel,

**LOCKE LORD LLP**

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***Pro Hac Vice Admission Pending***

Respectfully submitted,

**LOCKE LORD LLP**

/s/ Toyja E. Kelley  
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Counsel for Defendant Fasoo, Inc.

**CERTIFICATE OF SERVICE**

I certify that on April 5, 2022, I filed the foregoing document electronically through the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Toyja E. Kelley  
Toyja E. Kelley